

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) CHAPTER 11  
 )  
W.R. GRACE & CO., *et al.*, ) Case No. 01-01139 (JKF)  
 ) (Jointly Administered)  
Debtors. )  
 ) Re: Docket No. 23028

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**MOTION FOR EXPEDITED CONSIDERATION OF  
ANDERSON MEMORIAL HOSPITAL'S MOTION TO COMPEL  
DEBTORS TO PROVIDE FULL AND COMPLETE DEPOSITION  
ANSWERS AND FOR ADVANCED PERMISSION TO FILE A REPLY**

Pursuant to L.B.R. 9006-1(e), Anderson Memorial Hospital ("Movant") files this motion (the "Motion") for expedited consideration and to shorten notice (the "Motion to Expedite") of its above-referenced motion to compel (the "Motion to Compel") filed contemporaneously herewith, and for advanced permission to submit a reply in support of the Motion to Compel.

1. As detailed in the Motion to Compel, that motion seeks to compel the Debtors to instruct three of their witness, which Movant deposed, to respond to questions as to which Debtors' counsel instructed those witnesses not to answer at the witnesses' depositions.

2. Movant took these witnesses' depositions to seek discoverable evidence related to the upcoming confirmation hearing on September 8, 2009.

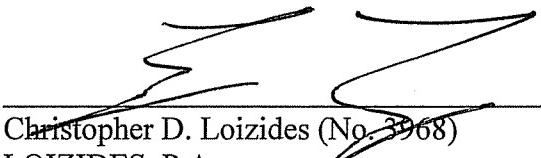
3. Movant requires a ruling on the Motion to Compel sufficiently in advance of the hearing to be able to resume the depositions and obtain complete answers.

4. For these reasons, Movant requests that expedited consideration of the Motion to Compel be granted.

5. Additionally, Movant respectfully requests advanced permission to file a reply to Debtors' response, due to the fact that the burden is on Debtors to justify their numerous

instructions to their witnesses not to answer questions at the depositions, and Movant would like the opportunity to respond to whatever justification they offer.

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Christopher D. Loizides (No. 3968)  
LOIZIDES, P.A.  
1225 King Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 654-0248  
Facsimile: (302) 654-0728  
E-mail: [loizides@loizides.com](mailto:loizides@loizides.com)

Daniel A. Speights (SC Fed. ID No. 4252)  
C. Alan Runyan (SC Fed ID No. 3683)  
SPEIGHTS & RUNYAN  
200 Jackson Avenue, East  
Post Office Box 685  
Hampton, SC 29924  
Telephone: (803) 943-4444  
Facsimile: (803) 943-4599

- and -

John W. Kozyak  
David L. Rosendorf  
KOZYAK TROPIN & THROCKMORTON PA  
2525 Ponce de Leon, 9<sup>th</sup> Floor  
Coral Gables, FL 33134  
Telephone: (305) 372-1800  
Facsimile: (305) 372-3508

*Counsel for Anderson Memorial Hospital*